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December 13, 2022

Hon. Judge Lorna Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY

**Re: Ramon Oliveras v. Long Island Railroad Company**  
**22 Civ. 4600 (LGS)**

Dear Judge Schofield:

This office represents the defendant, Long Island Railroad Company.

In response to the Court's Memo Endorsement dated 12/12/22, defendant has proffered to plaintiff 12/16 for depositions of two Long Island Railroad witnesses: Mr. Tustin and Mr. Brush.

Very truly yours,

**KREZ & FLORES, LLP**

*William J. Blumenschein*

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**WILLIAM J. BLUMENSCHN**

WJB/kf

cc: **FLYNN & WIETZKE, P.C.**  
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